

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

UNITED STATES OF AMERICA)	DOCKET NO. 3:14CR9253-RJC
)	
v.)	
)	DEFENDANT’S UNOPPOSED
MICAEL F. EGAN, III)	MOTION TO EXTEND
)	PRETRIAL MOTION
)	DEADLINE

NOW COMES Defendant MICHAEL F. EGAN, III, by and through undersigned counsel, and hereby moves to extend the deadline for filing pretrial motions in this case by four weeks.

Defendant is charged in a two-count indictment with securities fraud and wire fraud. If convicted as charged at trial, faces serious sentencing consequences.

On 1/13/15, this Honorable Court issued a Scheduling Order (Standing Arraignment Order) that required Defendant to file any pretrial motions within 60 days of the Order, resulting in a deadline of March 14 for filing pretrial motions.

The discovery initially received from the government consisted of over 24,000 pages of documents. At the end of last week, the defense received new, additional discovery comprised of over 97,000 pages. This new encrypted discovery was able to be opened yesterday for the first time. The pretrial motion filing deadline is currently just four days away and counsel will be out of town tomorrow through Tuesday. Thus, counsel will not be able to review the massive new discovery in order to determine the need for any pretrial motions and to actually prepare and file them by March 14.

The government, through assigned Assistant U.S. Attorney Kevin Zolot, does not oppose this motion.

Therefore, based on the foregoing, Defendant respectfully requests this Honorable Court to extend the pretrial motion filing deadline by four weeks to April 14, 2015.

Respectfully submitted,

March 10, 2015

s/ Mark P. Foster, Jr.
NC State Bar #22717
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CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the above **DEFENDANT'S UNOPPOSED MOTION TO EXTEND PRETRIAL MOTION DEADLINE** has been duly served on the attorney listed below by e-mail service through ECF on this date:

Kevin Zolot
Kevin.Zolot@usdoj.gov
U.S. Attorney's Office
227 W. Trade Street, 17th Floor
Charlotte, NC 28202

March 10, 2015

s/ Mark P. Foster, Jr.
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